

# Exhibit 138

Defendant Zuffa, LLC's Responses to  
Plaintiffs' Second, Third, and Fourth Set of  
Requests for Admission (excerpted)

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Ultimate Fighting Championship and UFC

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
21 Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
others similarly situated.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DEFENDANT ZUFFA, LLC'S  
RESPONSES TO PLAINTIFFS' SECOND,  
THIRD, AND FOURTH SET OF  
REQUESTS FOR ADMISSION**

## Plaintiffs,

V.

24 Zuffa, LLC, d/b/a Ultimate Fighting  
25 Championship and UFC,

### Defendant

1 **PROPOUNDING PARTY:** Plaintiffs

2 **RESPONDING PARTY:** Defendant Zuffa, LLC

3 **SET NO.:** Two, Three, and Four

4 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Zuffa,  
 5 LLC (“Zuffa”) hereby objects and responds as follows to Plaintiffs’ Second, Third, and Fourth  
 6 Set of Requests for Admission To Defendant Zuffa, LLC, including the “Instructions” and  
 7 “Definitions” incorporated therein (collectively, the “RFAs” or the “Requests”):

8 **GENERAL OBJECTIONS**

9 1. Zuffa objects to the definition of “You,” “Your,” “Your Company,” “Zuffa,” “UFC,” and  
 10 “Defendant” to the extent that this definition purports to encompass persons or entities that are  
 11 not the named defendant, Zuffa, LLC. For any RFA using this definition, Zuffa responds only on  
 12 behalf of the named defendant, Zuffa, LLC. Zuffa also objects to the extent that this definition  
 13 seeks responses from predecessor companies or entities that were acquired by or merged with  
 14 Zuffa. Zuffa further objects to this definition as vague, ambiguous, overbroad, and unduly  
 15 burdensome to the extent that it encompasses or purports to encompass “any persons acting or  
 16 purporting to act on behalf of the respondent Defendant.”

17 2. Zuffa objects to Instruction No. 2 to the extent it goes beyond the requirements of  
 18 Federal Rules of Civil Procedure 26 and 36. To the extent information is withheld on a basis of  
 19 privilege, Zuffa will produce a privilege log in the form agreed upon by the parties.

20 3. Zuffa objects to the RFAs to the extent that they seek information that is not  
 21 otherwise calculated to lead to discoverable evidence.

22 4. Zuffa objects to the RFAs, including all Definitions and Instructions, to the extent  
 23 they purport to impose upon Zuffa any requirements that exceed or are otherwise inconsistent  
 24 with the Federal Rules of Civil Procedure or any other applicable rule or court order.

25 5. Zuffa objects to the RFAs to the extent that they purport to call for information  
 26 protected from disclosure by applicable privileges, laws, doctrines or rules, including but not  
 27 limited to the attorney-client privilege, work product doctrine, and any applicable domestic or  
 28 foreign law, rule, order or agreement. The inadvertent disclosure of any privileged information

shall not constitute, or be deemed a waiver of, any applicable statutory, regulatory, common-law or other privilege with respect to such information. Zuffa hereby claims all applicable privileges and protections to the extent implicated by each RFA, and excludes privileged and protected information from the response to each RFA.

6. Zuffa objects to the RFAs to the extent that they are vague, overbroad, unduly burdensome, ambiguous, fail to specify with reasonable particularity the information sought, would unreasonably require Zuffa to speculate as to the nature and/or scope of the information sought, or seek information that is not relevant to the claims or defenses of the parties in the pending action or is not reasonably calculated to lead to the discovery of admissible evidence.

7. Zuffa objects to the RFAs to the extent that they imply the existence of facts or circumstances which do not or did not exist, and to the extent that they state or assume legal conclusions. In providing responses and objections to the RFAs, except as otherwise specified, Zuffa does not hereby admit, adopt or acquiesce to any factual or legal contention, presumption, assertion or characterization contained in the RFAs.

8. Zuffa reserves the right to later supplement or amend its responses to these RFAs.

9. The General Objections are incorporated into each of the following responses and shall be deemed continuing as to each response. These General Objections are not waived, or in any way limited, by the following responses.

## **RESPONSES AND OBJECTIONS TO RFAs**

**REQUEST NO. 3.** Admit that on March 27, 2007, at a press conference in Tokyo, Japan held to announce Zuffa's purchase of Pride FC, Lorenzo Fertitta stated that "Pride is already a global power house," as reflected in Exhibit 1.

**RESPONSE NO. 3:** Zuffa hereby incorporates the General Objections as though stated in full herein. Zuffa further objects to Exhibit 1 as an incomplete representation of the event cited in this Request. Zuffa refers to Exhibit 1 cited in the Request for a complete representation of its contents.

Subject to and without waiver of its specific and general objections, Zuffa admits.

**REQUEST NO. 4.** Admit that on March 27, 2007, at a press conference in Tokyo, Japan held to announce Zuffa's purchase of Pride FC, Lorenzo Fertitta stated that "this transaction advances

1       Pride and the UFC way beyond and light years ahead of any other MMA organization," as  
 2       reflected in Exhibit 1.

3       **RESPONSE NO. 4:** Zuffa hereby incorporates the General Objections as though stated in full  
 4       herein. Zuffa further objects to Exhibit 1 as an incomplete representation of the event cited in this  
 5       Request. Zuffa refers to Exhibit 1 cited in the Request for a complete representation of its  
 6       contents.

7       Subject to and without waiver of its specific and general objections, Zuffa admits.

8       **REQUEST NO. 5.** Admit that on August 6, 2009, at the UFC 101 press conference in  
 9       Philadelphia, Pennsylvania, Dana White stated regarding Zuffa's failure to sign Fedor  
 10       Emelianenko to the UFC: "That anybody would consider this guy the best in the world – you  
 11       know, I was saying this before – now, who the f\*\*\* is he going to fight? Who's he going to fight?  
 12       Nobody. He's not going to fight anybody. He's going to fight nobodies," as reflected in Exhibit 2.

13       **RESPONSE NO. 5:** Zuffa hereby incorporates the General Objections as though stated in full  
 14       herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this  
 15       Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its  
 16       contents.

17       Subject to and without waiver of its specific and general objections, Zuffa admits.

18       **REQUEST NO. 6.** Admit that on August 6, 2009, at the UFC 101 press conference in  
 19       Philadelphia, Pennsylvania, Dana White stated regarding Zuffa's failure to sign Fedor  
 20       Emelianenko to the UFC: "They [Emelianenko's representatives] were claiming that there was  
 21       some things in the contract they couldn't live with. Funny, every other fighter on earth, you  
 22       know, can sign the contract," as reflected in Exhibit 2.

23       **RESPONSE NO. 6:** Zuffa hereby incorporates the General Objections as though stated in full  
 24       herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this  
 25       Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its  
 26       contents.

27       Subject to and without waiver of its specific and general objections, Zuffa admits that  
 28       Dana White stated in part that "They were claiming that there was some things in the contract  
 29       they couldn't live with. Funny, every other fighter on earth, you know, can sign the contract."

30       **REQUEST NO. 7.** Admit that on August 6, 2009, at the UFC 101 press conference in  
 31       Philadelphia, Pennsylvania, Dana White stated regarding Strikeforce that "[t]hey have no  
 32       fighters," and that fighters in Strikeforce "have nobody to fight," as reflected in Exhibit 2.

33       **RESPONSE NO. 7:** Zuffa hereby incorporates the General Objections as though stated in full  
 34       herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this  
 35       Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its  
 36       contents.

37       Subject to and without waiver of its specific and general objections, Zuffa admits that  
 38       Dana White stated in part that "they have no fighters" and "have nobody to fight."

1       **REQUEST NO. 8.** Admit that on August 6, 2009, at the UFC 101 press conference in  
 2 Philadelphia, Pennsylvania, Dana White stated that Strikeforce “should’ve stayed the way they  
 3 were,” as reflected in Exhibit 2.

4       **RESPONSE NO. 8:** Zuffa hereby incorporates the General Objections as though stated in full  
 5 herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this  
 6 Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its  
 7 contents.

8               Subject to and without waiver of its specific and general objections, Zuffa admits that  
 9 Dana White stated in part “should have stayed the way they were.” Zuffa otherwise denies this  
 10 Request.

11       **REQUEST NO. 9.** Admit that on August 6, 2009, at the UFC 101 press conference in  
 12 Philadelphia, Pennsylvania, in response to the question of whether Zuffa was “going to do the  
 13 same thing you did with Affliction and counterprogram,” Dana White stated: “You wanna fight  
 14 me? We’re gonna fight. And we know how that goes. And we know how it ends,” as reflected in  
 15 Exhibit 2.

16       **RESPONSE NO. 9:** Zuffa hereby incorporates the General Objections as though stated in full  
 17 herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this  
 18 Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its  
 19 contents.

20               Subject to and without waiver of its specific and general objections, Zuffa admits.

21       **REQUEST NO. 10.** Admit that in a March 2011, interview with Mike Straka on Inside MMA,  
 22 Dana White stated, “Am I pleased about all of the organizations we’ve crushed before them  
 23 [Strikeforce]? Absolutely. Yeah, the ones that came out and wanted to fight and wanted to make a  
 24 fight out of it. Absolutely. I’m 100% happy about that,” as reflected in Exhibit 3.

25       **RESPONSE NO. 10:** Zuffa hereby incorporates the General Objections as though stated in full  
 26 herein. Zuffa further objects to Exhibit 3 as an incomplete representation of the event cited in this  
 27 Request. Zuffa refers to Exhibit 3 cited in the Request for a complete representation of its  
 28 contents.

29               Subject to and without waiver of its specific and general objections, Zuffa admits that  
 30 Dana White stated in part “Am I pleased about all of people, the organizations we’ve crushed  
 31 before them? Absolutely. Yeah, the ones that came out and wanted to fight and wanted to make a  
 32 fight out of it. Absolutely. 100% happy about that.”

33       **REQUEST NO. 11.** Admit that in a March 4, 2011, episode of “Fighting Words with Mike  
 34 Straka,” Lorenzo Fertitta stated: “I will tell you that hands down the most important thing for our  
 35 company, and literally kind of the mantra of how we run this thing, is that all the verticals,  
 36 everything we do points to one thing, and there has to be a tie back to pay-per-view,” as reflected  
 37 in Exhibit 4.

38       **RESPONSE NO. 11:** Zuffa hereby incorporates the General Objections as though stated in full  
 39 herein. Zuffa further objects to Exhibit 4 as an incomplete representation of the event cited in this

1 Request. Zuffa refers to Exhibit 4 cited in the Request for a complete representation of its  
 2 contents.

3       Subject to and without waiver of its specific and general objections, Zuffa admits.

4 **REQUEST NO. 12.** Admit that in a March 4, 2011, episode of “Fighting Words with Mike  
 5 Straka,” Lorenzo Fertitta stated: “Look no one has an original idea. Really, at the end of the day,  
 6 you’re taking little things from all of these different areas to try to come up with ideas to make  
 7 your business better. You have – we looked at NASCAR with how they ran their business, and  
 8 how fan friendly they were and really tried to please the fans and create an experience for them.  
 You have WWE, which our model is very similar from a business stand point, the way pay-per-  
 view works, how they do everything. They do TV, everything they do bounces you to pay-per-  
 view, what I was talking about earlier. The same type of idea,” as reflected in Exhibit 4.

9 **RESPONSE NO. 12:** Zuffa hereby incorporates the General Objections as though stated in full  
 10 herein. Zuffa further objects to Exhibit 4 as an incomplete representation of the event cited in this  
 Request. Zuffa refers to Exhibit 4 cited in the Request for a complete representation of its  
 11 contents.

12       Subject to and without waiver of its specific and general objections, Zuffa admits.

13 **REQUEST NO. 13.** Admit that in a September 2011, interview at Zuffa’s headquarters in Las  
 14 Vegas, Nevada with media outlet Heavy MMA, Lorenzo Fertitta stated: “Sure, are there fighters  
 15 that are going to want to get paid more? Of course. There are always people that are unhappy,” as  
 reflected in Exhibit 5.

16 **RESPONSE NO. 13:** Zuffa hereby incorporates the General Objections as though stated in full  
 17 herein. Zuffa further objects to Exhibit 5 as an incomplete representation of the event cited in this  
 Request. Zuffa refers to Exhibit 5 cited in the Request for a complete representation of its  
 18 contents.

19       Subject to and without waiver of its specific and general objections, Zuffa admits.

20 **REQUEST NO. 14.** Admit that in unedited footage of an interview with Lorenzo Fertitta from a  
 21 segment on ESPN’s “Outside The Lines” released by Zuffa on January 16, 2012, Lorenzo Fertitta  
 22 stated in response to the question of whether the percentage of revenue that Zuffa pays fighters is  
 23 50%: “In that neighborhood, yeah. In that neighborhood,” as reflected in Exhibit 6.

24 **RESPONSE NO. 14:** Zuffa hereby incorporates the General Objections as though stated in full  
 25 herein. Zuffa further objects to Exhibit 6 as an incomplete representation of the event cited in this  
 Request. Zuffa refers to Exhibit 6 cited in the Request for a complete representation of its  
 26 contents.

27       Subject to and without waiver of its specific and general objections, Zuffa admits that  
 28 Lorenzo Fertitta stated in part “In that neighborhood, yeah. In that neighborhood.”

29 **REQUEST NO. 15.** Admit that in unedited footage of an interview with Lorenzo Fertitta from a  
 30 segment on ESPN’s “Outside The Lines” released by Zuffa on January 16, 2012, Lorenzo Fertitta  
 31 stated regarding Zuffa’s acquisition of Strikeforce: “From a fighter’s standpoint, we have taken

1 these fighters, and now we have the ability to allow them to make more money. They were stuck  
 2 in Strikeforce, where there was no pay-per-view revenue there," as reflected in Exhibit 6.

3 **RESPONSE NO. 15:** Zuffa hereby incorporates the General Objections as though stated in full  
 4 herein. Zuffa further objects to Exhibit 6 as an incomplete representation of the event cited in this  
 5 Request. Zuffa refers to Exhibit 6 cited in the Request for a complete representation of its  
 6 contents.

7       Subject to and without waiver of its specific and general objections, Zuffa admits that  
 8 Lorenzo Fertitta stated in part that "From a fighter's standpoint, we have taken these fighters, and  
 9 now we have the ability to allow them to make more money. They were stuck in Strikeforce,  
 10 where there was no pay-per-view revenue there."

11 **REQUEST NO. 16.** Admit that in unedited footage of an interview with Lorenzo Fertitta from a  
 12 segment on ESPN's "Outside The Lines" released by Zuffa on January 16, 2012, Lorenzo Fertitta  
 13 stated: "There are no barriers to entry in this business. Now, the perfect example is look what we  
 14 did. Do you know what we did? We took our money, we risked it. We went out and got a  
 15 promoter's license. We put together a great business plan. We rolled up our sleeves, we worked,  
 16 and we made this work. And we built this business. Somebody else can do that – easily. There are  
 17 no barriers to entry," as reflected in Exhibit 6.

18 **RESPONSE NO. 16:** Zuffa hereby incorporates the General Objections as though stated in full  
 19 herein. Zuffa further objects to Exhibit 6 as an incomplete representation of the event cited in this  
 20 Request. Zuffa refers to Exhibit 6 cited in the Request for a complete representation of its  
 21 contents.

22       Subject to and without waiver of its specific and general objections, Zuffa admits.

23 **REQUEST NO. 17.** Admit that in unedited footage of an interview with Lorenzo Fertitta from a  
 24 segment on ESPN's "Outside The Lines" released by Zuffa on January 16, 2012, Lorenzo Fertitta  
 25 stated: "There never has been a comparable outlet [to the UFC]. There never has been. When has  
 26 there ever been a comparable outlet? We've dominated this, this sport, alright? We've dominated  
 27 the space," as reflected in Exhibit 6.

28 **RESPONSE NO. 17:** Zuffa hereby incorporates the General Objections as though stated in full  
 29 herein. Zuffa further objects to Exhibit 6 as an incomplete representation of the event cited in this  
 30 Request. Zuffa refers to Exhibit 6 cited in the Request for a complete representation of its  
 31 contents

32       Subject to and without waiver of its specific and general objections, Zuffa admits.

33 **REQUEST NO. 18.** Admit that in a 2013 interview with GlobalSportsJobs.com, Lorenzo Fertitta  
 34 stated: "I think growing up and being such a big boxing fan, I really did look up to what Don  
 35 King and Bob Arum, being successful promoters, were able to achieve. They paved the way for  
 36 basically our business model. They paved the way as far as broadening the landscape of fans for  
 37 combat sports," as reflected in Exhibit 7.

38 **RESPONSE NO. 18:** Zuffa hereby incorporates the General Objections as though stated in full  
 39 herein. Zuffa further objects to Exhibit 7 as an incomplete representation of the event cited in this  
 40 Request.

1 Request. Zuffa refers to Exhibit 7 cited in the Request for a complete representation of its  
2 contents.

3 Subject to and without waiver of its specific and general objections, Zuffa admits.

4 **REQUEST NO. 19.** Admit that on January 8, 2013 at the New Media Expo Convention in Las  
5 Vegas, Nevada, Dana White stated: “We have the largest fight library in the world. We bought a  
6 bunch of different leagues out there – WEC, WFA, Pride – and we have a huge library that we  
7 monetize,” as reflected in Exhibit 8.

8 **RESPONSE NO. 19:** Zuffa hereby incorporates the General Objections as though stated in full  
9 herein. Zuffa further objects to Exhibit 8 as an incomplete representation of the event cited in this  
10 Request. Zuffa refers to Exhibit 8 cited in the Request for a complete representation of its  
11 contents.

12 Subject to and without waiver of its specific and general objections, Zuffa admits, except  
13 that the event referred to in Request No. 19 took place on January 7, 2013.

14 **REQUEST NO. 20.** Admit that on February 16, 2013 at the UFC on FUEL TV 7 post-fight  
15 media scrum in London, England, that Dana white stated: “I can tell you this man. If you fucking  
16 call Joe Silva and turn down a fight, you might as well say fucking rip up my contract. He’s a  
17 mean little fucker. You don’t call Joe Silva and tell him you don’t want to fucking fight anybody  
18 man. You might as well just take the fight because it’s going to be worse. You might as well just  
19 do it. Fuck it, alright I’ll fight him,” as reflected in Exhibit 9.

20 **RESPONSE NO. 20:** Zuffa hereby incorporates the General Objections as though stated in full  
21 herein. Zuffa further objects to Exhibit 9 as an incomplete representation of the event cited in this  
22 Request. Zuffa refers to Exhibit 9 cited in the Request for a complete representation of its  
23 contents.

24 Subject to and without waiver of its specific and general objections, Zuffa admits.

25 **REQUEST NO. 21.** Admit that on February 22, 2013 at the UFC 157 pre-fight media scrum in  
26 Anaheim, California, Dana White stated: “This is the UFC. This is the pinnacle of this sport. The  
27 best fighters in the world fight here.”

28 **RESPONSE NO. 21:** Zuffa hereby incorporates the General Objections as though stated in full  
herein.

29 Subject to and without waiver of its general objections, Zuffa admits.

30 **REQUEST NO. 22.** Admit that on February 22, 2013 at the UFC 157 pre-fight media scrum in  
31 Anaheim, California, Dana White stated: “We have 470-something guys under contract, okay?  
32 We have over 100 guys too many. We have over 100 guys too many on the roster right now,” as  
33 reflected in Exhibit 10.

34 **RESPONSE NO. 22:** Zuffa hereby incorporates the General Objections as though stated in full  
35 herein. Zuffa further objects to Exhibit 10 as an incomplete representation of the event cited in  
36 this Request. Zuffa refers to Exhibit 10 cited in the Request for a complete representation of its  
37 contents.

Subject to and without waiver of its specific and general objections, Zuffa admits.

**REQUEST NO. 23.** Admit that on April 8, 2013 at the Global Speaker Series at the Stanford Graduate School of Business in Stanford, California, Dana White stated: “The biggest mistake that everybody makes when they try to compete with us is that they try to compete with us,” as reflected in Exhibit 11.

**RESPONSE NO. 23:** Zuffa hereby incorporates the General Objections as though stated in full herein. Zuffa further objects to Exhibit 11 as an incomplete representation of the event cited in this Request. Zuffa refers to Exhibit 11 cited in the Request for a complete representation of its contents.

Subject to and without waiver of its specific and general objections, Zuffa admits.

**REQUEST NO. 24.** Admit that on April 8, 2013 at the Global Speaker Series at the Stanford Graduate School of Business in Stanford, California, Dana White stated: “Nobody ever wants to look at themselves as a feeder league to the UFC. Deal with it. You’re all feeder leagues to the UFC, okay. I want them to exist and make money because those guys create the next talent that will end up in our organization someday,” as reflected in Exhibit 11.

**RESPONSE NO. 24:** Zuffa hereby incorporates the General Objections as though stated in full herein. Zuffa further objects to Exhibit 11 as an incomplete representation of the event cited in this Request. Zuffa refers to Exhibit 11 cited in the Request for a complete representation of its contents.

Subject to and without waiver of its specific and general objections, Zuffa admits.

**REQUEST NO. 25.** Admit that on November 15, 2013 at the UFC 167 pre-fight media scrum in Las Vegas, Nevada, Dana White stated regarding Strikeforce: “I feel sorry for the kids that fight there. I do, I truly feel sorry for the kids that have to be stuck in that shithole,” as reflected in Exhibit 12.

**RESPONSE NO. 25:** Zuffa hereby incorporates the General Objections as though stated in full herein. Zuffa further objects to Exhibit 12 as an incomplete representation of the event cited in this Request. Zuffa refers to Exhibit 12 cited in the Request for a complete representation of its contents.

Subject to and without waiver of its specific and general objections, Zuffa admits, except that the event referred to in Request No. 25 took place on November 14, 2013.

**REQUEST NO. 26.** Admit that in an interview that aired on February 13, 2014 with Graham Bensinger on “In Depth With Graham Bensinger,” Dana White stated regarding fighter pay in the UFC: “The opportunities today are just like playing in the NFL or playing in the NBA or Major League Baseball.” as reflected in Exhibit 13.

**RESPONSE NO. 26:** Zuffa hereby incorporates the General Objections as though stated in full herein. Zuffa further objects to Exhibit 13 as an incomplete representation of the event cited in this Request. Zuffa refers to Exhibit 13 cited in the Request for a complete representation of its contents.

Subject to and without waiver of its specific and general objections, Zuffa admits.

**REQUEST NO. 27.** Admit that in an interview that aired on February 13, 2014, with Graham Bensinger on “In Depth With Graham Bensinger,” Dana White stated: “Trust me when I tell you these guys [UFC fighters] are making a lot of money. And we are on par with all the other sports leagues out there,” as reflected in Exhibit 13.

**RESPONSE NO. 27:** Zuffa hereby incorporates the General Objections as though stated in full herein. Zuffa further objects to Exhibit 13 as an incomplete representation of the event cited in this Request. Zuffa refers to Exhibit 13 cited in the Request for a complete representation of its contents.

Subject to and without waiver of its specific and general objections, Zuffa admits that Dana White stated in part “Trust me when I tell you these guys are making a lot of money. And we are on par with all the other sports leagues out there.”

**REQUEST NO. 28.** Admit that on April 4, 2014, at The Leaders Sport Summit in London, England, Lorenzo Fertitta stated: “You put these athletes that are world class in the Octagon, let them compete, that translates anywhere in the world,” as reflected in Exhibit 14.

**RESPONSE NO. 28:** Zuffa hereby incorporates the General Objections as though stated in full herein. Zuffa further objects to Exhibit 14 as an incomplete representation of the event cited in this Request. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its contents.

Subject to and without waiver of its specific and general objections, Zuffa admits, except that the event referred to in Request No. 28 took place in March 2014.

**REQUEST NO. 29.** Admit that on April 4, 2014, at The Leaders Sport Summit in London, England, Lorenzo Fertitta stated UFC fighters are “world class,” as reflected in Exhibit 14.

**RESPONSE NO. 29:** Zuffa hereby incorporates the General Objections as though stated in full herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its contents.

Subject to and without waiver of its specific and general objections, Zuffa admits that Lorenzo Fertitta stated in part “world class,” except that the event referred to in Request No. 29 took place in March 2014. Zuffa otherwise denies this Request.

**REQUEST NO. 30.** Admit that on April 4, 2014, at The Leaders Sport Summit in London, England, Lorenzo Fertitta stated: “There’s going to be some [fighters] that are more popular than others, but at the end of the day, it’s the UFC that’s the seal and the brand that says to the consumer that these are the best fighters in the world,” as reflected in Exhibit 14.

**RESPONSE NO. 30:** Zuffa hereby incorporates the General Objections as though stated in full herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its contents.

Subject to and without waiver of its specific and general objections, Zuffa admits, except that the event referred to in Request No. 30 took place in March 2014.

1       **REQUEST NO. 31.** Admit that on April 4, 2014, at The Leaders Sport Summit in London,  
 2       England, Lorenzo Fertitta stated: “At the end of the day, we have built this business to the point  
 3       where I think from a consumer’s standpoint, people don’t necessarily refer to MMA. They don’t  
 4       say ‘Hey, I’m going to watch an MMA fight tonight.’ We have sort of transcended this sport in a  
 5       sense that UFC has become the sport in a way,” as reflected in Exhibit 14.

6       **RESPONSE NO. 31:** Zuffa hereby incorporates the General Objections as though stated in full  
 7       herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its  
 8       contents.

9       Subject to and without waiver of its specific and general objections, Zuffa admits, except  
 10      that the event referred to in Request No. 31 took place in March 2014.

11      **REQUEST NO. 32.** Admit that on April 4, 2014, at The Leaders Sport Summit in London,  
 12      England, Lorenzo Fertitta stated: “[A]t the end of the day, we really have kind of become the gold  
 13      standard in a sense. When you look at the top 10 in every division, we’ve got every fighter under  
 14      our umbrella. All the fighters want to be with us because they want to fight the best competition.  
 15      So from that standpoint, I think there is really – the competition isn’t really relevant in that  
 16      sense,” as reflected in Exhibit 14.

17      **RESPONSE NO. 32:** Zuffa hereby incorporates the General Objections as though stated in full  
 18      herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its  
 19      contents.

20      Subject to and without waiver of its specific and general objections, Zuffa admits, except  
 21      that the event referred to in Request No. 32 took place in March 2014.

22      **REQUEST NO. 33.** Admit that on April 4, 2014, at The Leaders Sport Summit in London,  
 23      England, Lorenzo Fertitta stated: “We’re lucky in the sense that for any aspiring athlete that  
 24      wants to become a fighter, we’re at the top of the food chain. They want to, their goal is  
 25      eventually to get to the UFC. So the talent pool is kind of coming to us so we kind of have the  
 26      pick of the best fighters that are potentially out there,” as reflected in Exhibit 14.

27      **RESPONSE NO. 33:** Zuffa hereby incorporates the General Objections as though stated in full  
 28      herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its  
 29      contents.

30      Subject to and without waiver of its specific and general objections, Zuffa admits, except  
 31      that the event referred to in Request No. 33 took place in March 2014.

32      **REQUEST NO. 34.** Admit that on July 5, 2016, at the UFC 162 pre-fight media scrum in Las  
 33      Vegas, Nevada, Dana White stated that “the guys who are complaining about this [fighter pay]  
 34      are the guys who don’t matter,” as reflected in Exhibit 15.

35      **RESPONSE NO. 34:** Zuffa hereby incorporates the General Objections as though stated in full  
 36      herein. Zuffa further objects to Exhibit 15 as an incomplete representation of the event cited in  
 37      this Request. Zuffa refers to Exhibit 15 cited in the Request for a complete representation of its  
 38      contents.